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July 31, 2015

VIA ECF

Honorable Laura Taylor Swain
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: **LP Funding, LLC v. Tantech Holdings, Ltd., No. 15 Civ. 4081 (LTS) (KNF)**

Dear Judge Swain:

We are counsel to defendant Tantech Holdings, Ltd. ("Tantech").

By letter dated July 29, 2015, we requested a 30-day adjournment of the pre-trial conference and a 30-day extension of Tantech's time to respond to the complaint because (i) we only recently were retained and needed additional time to discuss the case with our client, which is based in China, and to gather and familiarize ourselves with the facts; and (ii) have previously scheduled and pre-paid family vacations in the month of August and the first week of September. We also noted that no prior request for any additional time had been made.

By order dated July 30, 2015, Your Honor adjourned the initial pretrial conference to September 18, 2015 and extended Tantech's time to respond to the complaint from September 1, 2015 until September 4, 2015.

For the same reasons set forth above, we respectfully submit this letter motion to request an extension of Tantech's time to respond to the complaint until October 2, 2015. Plaintiff's counsel will not agree to the requested extension. Tantech made one prior request for an extension of such time with its July 29, 2015 letter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Harry H. Rimm".

Harry H. Rimm

cc: All Counsel of Record (Via ECF)